

# Exhibit A

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE:	§	Case No. 16-34028
	§	
NORTHSTAR OFFSHORE GROUP LLC,	§	
	§	
Debtor.	§	Chapter 11
	§	
JAMES KATCHADURIAN, Litigation Trustee,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adversary No. 18-03079
	§	
NGP ENERGY CAPITAL MANAGEMENT,	§	
L.L.C., et al.,	§	
	§	
Defendants.	§	

**DECLARATION OF AVERY ALCORN  
IN SUPPORT OF TRUSTEE’S SUPPLEMENT TO  
OPPOSITION TO MOTIONS TO DISMISS**

1. My name is Avery Alcorn. I served as the Chief Financial Officer and Senior Vice President of Northstar Offshore Group, LLC (“Northstar”) before and during the above-captioned Chapter 11 case. As Chief Financial Officer, I became familiar with Northstar’s business operations, assets, liabilities, day-to-day operations, and financial affairs. I interacted with Northstar’s professionals and other officers, and I was actively involved in Northstar’s bankruptcy case and its efforts to restructure or reorganize its business, debts, and liabilities. I am over the age of eighteen and of sound mind. I was employed by Northstar prior to its bankruptcy, joining the company in 2012. I have personal knowledge of the facts stated herein, including details concerning the company’s various vendors and creditors, and they are true and correct.

2. The following unsecured creditors of Northstar were creditors at the time of Northstar’s purchase of the Creole Field assets from Propel Energy, LLC in October 2012 and at the time of Northstar’s bankruptcy in August 2016:

- A&B Valve & Piping, LLC (Creditor No. 9785128),
- Dulan, LLC (Creditor No. 9602398),
- J. Connor Consulting, Inc. (Creditor No. 9602434),
- Martin Energy Services (Creditor No. 9602445),
- Quality Construction & Production LLC (Creditor No. 9602483),
- Quality Production Management (Creditor No. 9602485),
- RigNet, Inc. (Creditor No. 9798260),

- Stallion Offshore Quarters, Inc. (Creditor No. 9602507),
- Transcontinental Gas Pipeline LLC (Creditor No. 9798455),
- United Vision Logistics (Creditor No. 9637875), and
- Wood Group PSN, Inc. (Creditor No. 9602540).

3. The following unsecured creditors of Northstar were creditors at the time of the closing of the sale of Northstar to LaFitte Energy Corp. in September 2014 and at the time of Northstar's bankruptcy in August 2016:

- A&B Valve & Piping, LLC (Creditor No. 9785128),
- American Eagle Logistics, LLC (Creditor No. 9602361),
- Archrock Partners (Creditor No. 9798210),
- Atchafalaya Measurement Controls, Inc. (Creditor No. 9602370),
- Coastal Crewboats, Inc. (Creditor No. 9602390),
- Dulan, LLC (Creditor No. 9602398),
- Gulf-Pro Services (Creditor No. 9574564),
- Halliburton Energy Services, Inc. (Creditor No. 9602425),
- J. Connor Consulting, Inc. (Creditor No. 9602434),
- Martin Energy Services (Creditor No. 9602445),
- Measurement Technologies, Inc. (Creditor No. 9602446),
- Offshore Rental (Creditor No. 9602461),
- Petronyx, LLC (Creditor No. 9805713),
- Quality Construction & Production LLC (Creditor No. 9602483),
- Quality Production Management (Creditor No. 9602485),
- RigNet, Inc. (Creditor No. 9798260),
- SempCheck Services Inc. (Creditor No. 9602499),
- Stallion Offshore Quarters, Inc. (Creditor No. 9602507),
- Traco Production Services, Inc. (Creditor No. 9602521),
- Transcontinental Gas Pipeline, LLC (Creditor No. 9798455),
- United Vision Logistics (Creditor No. 9637875), and
- Wood Group PSN, Inc. (Creditor No. 9602540).

4. To be clear, the creditors listed in paragraphs 2 and 3 had different claims and were owed different amounts on the dates specified above. In addition, Northstar had hundreds of creditors at the time of its bankruptcy, and the creditors listed in paragraphs 2 and 3 do not necessarily reflect all Northstar creditors who had claims on the relevant dates.

5. For a large number of Northstar's vendors, including many of those listed in paragraphs 2 and 3, Northstar had an ongoing commercial relationship with such vendor, including monthly payment arrangements and invoicing for work performed under master services agreements. For example, Dulan, LLC provides services to customers in the energy industry relating to monitoring, gathering, and processing of real-time data on remote equipment. Starting in October 2012 and up to the time of Northstar's bankruptcy, Dulan invoiced Northstar monthly for services under a Monitoring Agreement. Similarly, the Wood Group of companies provides project, engineering, and technical services to customers in the energy and industrial markets. Also

starting in October 2012 and continuing through the time of Northstar's bankruptcy, the Wood Group invoiced Northstar on a regular basis for services performed under a Master Services Agreement.

6. From the vendors listed in paragraphs 2 and 3 of this declaration, many had master services agreements with Northstar under which such vendors performed work for Northstar and invoiced the company on a regular basis, including: Atchafalaya Measurement, Inc., Dulan, LLC, American Eagle Logistics, LLC, Coastal Crewboats, Inc., Gulf-Pro Services, Measurement Technologies, Inc., and Wood Group.

7. I declare under the penalty of perjury that the foregoing is true and correct.

Executed on the 10th day of September, 2018.

/s/ Avery Alcorn

Avery Alcorn